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13 FARMERS INSURANCE EXCHANGE, and  
21st CENTURY INSURANCE COMPANY

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 RONALD STALLONE, on behalf of himself  
17 and all other persons similarly situated,

Case No. 2:21-cv-01659-GMN-VCF

18 Plaintiff,

19 v.

20 FARMERS GROUP, INC., a Nevada  
21 Corporation; FARMERS INSURANCE  
22 EXCHANGE; and TRUCK INSURANCE  
EXCHANGE,

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S  
SECOND AMENDED COMPLAINT**

**(FIRST REQUEST)**

23 Defendants.

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1                   Defendants FARMERS GROUP, INC., FARMERS INSURANCE EXCHANGE, and 21st  
 2 CENTURY INSURANCE COMPANY (collectively, “Defendants”) and Plaintiff RONALD  
 3 STALLONE (“Plaintiff”) submit this stipulation and proposed order to extend Defendants’  
 4 deadline to file their response to Plaintiff’s Second Amended Complaint (“SAC”). This is the first  
 5 request or stipulation to extend Defendants’ deadline to respond to the SAC.

6                   1. Plaintiff filed his SAC on October 26, 2022. (ECF No. 58).

7                   2. Defendants’ response to the SAC is currently due on November 9, 2022.

8                   3. Given the putative class and other allegations contained in the SAC, Defendants  
 9 require additional time to prepare and file a response.

10                  4. The parties stipulate—in good faith, and not for purposes of delay—to extend the  
 11 response deadline from November 9, 2022 to November 30, 2022.

12                  5. This proposed schedule will permit Defendants sufficient time to investigate and  
 13 properly respond to the factual allegations in the SAC and accounts for the upcoming Thanksgiving  
 14 holiday.

15                  6. For these reasons, the parties stipulate that Defendants’ response to the SAC shall  
 16 be due on or before **November 30, 2022**.

17                  **IT IS SO STIPULATED.**

18                  DATED this 2nd day of November, 2022.

19                  \_\_\_\_\_  
 20                  /s/ *Jennifer K. Hostetler*

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20 (\*admitted pro hac vice)

21 Attorneys for Plaintiff and the putative  
22 Class

23 IT IS SO ORDERED.



24 Cam Ferenbach  
25 United States Magistrate Judge

26 11-7-2022

27 DATED \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of November, 2022, I caused a true and accurate copy of the foregoing document **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO SECOND AMENDED COMPLAINT** to be filed with the Clerk of the Court via the CM/ECF system, which will send an electronic copy to all interested parties.

*/s/ Dana K. Provost*  
An employee of Lewis Roca Rothgerber Christie LLP